

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MARK LENZI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:21-cv-1371 (PTG/IDD)
	)	
U.S. DEPARTMENT OF STATE and	)	
ANTONY J. BLINKEN, U.S. Secretary of State,	)	
	)	
Defendants.	)	
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**JOINT MOTION FOR ORDER GOVERNING SUMMARY JUDGMENT BRIEFING**

Pursuant to Local Rule 7, the parties, through their undersigned counsel, jointly and respectfully request that the Court enter the following proposal regarding the briefing of the parties anticipated cross-motions for summary judgment. The grounds for this motion are as follows:

1. This is a case involving allegations of disability discrimination and retaliation under the Rehabilitation Act. The Court held a final pre-trial conference on January 18, 2023, at which it set the case for trial beginning on April 18, 2023. Dkt No. 82.
2. The Court further directed the parties to establish a summary judgment briefing schedule and proposed order. Dkt. No. 82.
3. Consistent with the Court's direction, the parties have developed a proposed schedule for their motions for summary judgment. This schedule, which consolidates the briefing of cross-motions into a single briefing schedule, will facilitate judicial economy and streamline the issues for the Court to consider in four briefs instead of six. Accordingly, the parties jointly and respectfully request that the Court enter the following proposed schedule:
  - a. Defendants shall file a motion and brief in support of summary judgment on or before February 10, 2023;

- b. Plaintiff shall file a combined cross-motion for summary judgment and opposition to Defendants' motion for summary judgment on or before February 28, 2023;
- c. Defendants shall file a combined reply in support of their motion for summary judgment and opposition to Plaintiff's cross-motion for summary judgment on or before March 17, 2023;
- d. Plaintiff shall file a reply in support of his cross-motion for summary judgment on or before March 24, 2023;
- e. The Court may schedule a hearing on the parties' motion on April 4, 2023, or otherwise at the convenience of the Court.

4. Consistent with Local Rule 7(F)(3) and the default page lengths that govern briefing in this District, Plaintiff requests, and Defendants do not oppose, the following page lengths for each brief: 30 pages for Defendants' opening motion, 60 pages for Plaintiff's combined cross-motion and opposition, 50 pages for Defendants' combined reply and opposition, and 20 pages for Plaintiff's reply.

A proposed order is attached for the Court's convenience.

Dated: January 31, 2023

Respectfully submitted,

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